



September 16, 2011

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814  
[Commentletters@waterboards.ca.gov](mailto:Commentletters@waterboards.ca.gov)



Re: Opposition to Caltrans MS4 NPDES Permit

Dear State Water Board Members and Staff:

On behalf of the Board of Directors and the membership of the Greater Bakersfield Chamber of Commerce (GBCC), I am writing to express our opposition to the State Water Board's proposed Caltrans MS4 NPDES Permit. This permit would impose extensive new regulations on all future Caltrans road construction projects that far surpass what the federal government requires from states under the federal Clean Water Act. **The Chamber opposes the diversion and allocation of dedicated transportation funds to other purposes unrelated to transportation.**

If implemented, Caltrans estimates that the draft permit would drain an estimated \$600 million annually from state road construction projects each year. Such enormous costs would result in the elimination of thousands of jobs in the construction industry at a time when our unemployment rate stands at 12 percent.

We are concerned that the proposed permit would significantly shift Caltrans' focus from improving roadways to retrofitting existing infrastructure to meet the permit's requirements. This would worsen road conditions, create unsafe driving environments, and force California motorists to pay more for driving on under-maintained roadways.

While we support efforts to improve water quality, there is no evidence that these proposed regulations would proportionally improve water quality to justify spending \$600 million taxpayer dollars each year.

Our Chamber continually works to improve the business climate and eliminate or minimize California regulations that have adverse economic impacts and decrease the competitiveness of local businesses. It is for these reasons that the GBCC opposes the proposed Caltrans MS4 NPDES permit and requests that the State Water Board work with Caltrans to come up with a more cost-effective permit that improves water quality without defunding our transportation system. We thank you in advance for your kind consideration of our request. Please feel free to contact me at (661) 327-4421, should you have questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Debra L. Moreno", with a long horizontal flourish extending to the right.

Debra L. Moreno  
President and CEO

Greater Bakersfield Chamber of Commerce  
*Your Partner in Business.*